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28 UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

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18 UNITED STATES OF AMERICA,) **Magistrate No. 2:17-mj-00965-VCF**
19 Plaintiff,)
20 vs.)
21 SHAQUILLA STAFFORD, aka)
22 Shaquilla Brown,)
23 Defendant.)
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STIPULATION TO CONTINUE PRELIMINARY HEARING

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27 IT IS HEREBY STIPULATED AND AGREED, by and between Steven W. Myhre,
28 Acting United States Attorney, and Phillip N. Smith, Jr., Assistant United States Attorney,
counsel for the United States of America, and Telia U. Williams, Esq. counsel for Defendant

1 SHAQUILLA BROWN (née STAFFORD), that the preliminary hearing for the above-captioned
2 matter, currently scheduled for October 24, 2017, at the hour of 4:00 p.m., be vacated and
3 continued to a date and time convenient for this Court, but in no event earlier than thirty (30)
4 days.

5 This stipulation is entered for the following reasons:

6 1. The Government has made an early offer, and production of some discovery to
7 the Defendant, in an effort to reach a pre-indictment plea agreement.

8 2. Counsel for the Defendant has reviewed the discovery and the offer with the
9 Defendant, but requires additional time to adequately review these items with the Defendant to
10 her satisfaction.

11 3. If the Defendant and the Government succeed in forging an early agreement, the
12 Government will be expected to tender a proposed written plea agreement to the Defendant.
13 Said plea agreement will obviate the need for either a preliminary hearing in this matter, or for
14 the Government to present this matter to a federal grand jury.

15 4. Thirty days are therefore requested in which to provide counsel for the Defendant
16 sufficient time to consider any proposed plea agreement, and advise her client concerning it.

17 3. The Defendant is in custody, but she does not object to the continuance.

18 4. Denial of this request for continuance of the preliminary hearing would
19 potentially prejudice both the Defendant and the Government, and unnecessarily consume this
20 Court's valuable resources, taking into account the exercise of due diligence.

21 5. Additionally, denial of this request for continuance could result in a miscarriage
22 of justice.

23 6. The additional time requested by this stipulation is excludable in computing the
24 time within which the defendant must be indicted and the trial herein must commence pursuant
25 to the Speedy Trial Act, 18 U.S.C. §§ 3161(b) and 3161(h)(8)(A), considering the factors under
26 18 U.S.C. § 3161(h)(8)(B)(i) and (iv).

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7. This is the first request for a continuance of the preliminary hearing herein.

DATED: October 23, 2017.

/s/

PHILLIP N. SMITH, JR.
Assistant United States Attorney
Counsel for the United States

/s/

TELIA WILLIAMS, ESQ.
Counsel for the Defendant

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

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ORDER

Based on the pending Stipulation of counsel, and good cause appearing therefore, **IT IS
HEREBY ORDERED**, that the preliminary hearing in the above-captioned matter, currently
scheduled for October 24, 2017, at the hour of 4:00 p.m., be vacated and continued to
November 27, 2017 at the hour of 4:00 P.m. in courtroom 3D.

UNITED STATES MAGISTRATE JUDGE
Dated: October 24, 2017